

MIAMI-DADE HOUSING AGENCY

PHA PLAN NARRATIVE

5-Year Plan 2005 through 2009
and Annual Plan 2005-2006

MIAMI-DADE HOUSING AGENCY

PHA PLAN NARRATIVE

TABLE OF CONTENTS	Page
	1
Part I. 5-Year Plan	3
1.1 Mission Statement	3
1.2 Goals and Objectives	
Part 2. Annual Plan	5
2.1 Needs Assessment (Low-Income and Very-Low Income Families including Elderly Families and Families with Disabilities)	5
2.2 Financial Resources	6
2.2.1 Source and Use of Funds	
2.3 Selection and Admission Policies	6
2.3.1 Public Housing Program (ACOP)	
2.3.2 Section 8 Program (Administrative Plan)	
2.4 Rent Determination	7
2.4.1 Public Housing Program	
2.4.2 Section 8 Program Tenant-based Program	
2.5 Operation and Management	9
2.5.1 Management Organization	
2.5.2 Programs Administered	
2.5.3 Management and Maintenance Policies	
2.5.4 Grievance Procedures	
2.5.5 Fraud Investigation and audit	
2.6 Capital Improvements	17
2.6.1 Capital Fund Five Year Plan	
2.6.2 Capital Fund Annual Statement	
2.6.3 HOPE VI	

2-7	Demolition and/or Disposition	19
	2.7.1 HOPE VI Demolition and Revitalization of Scott Homes	
	2.7.2 Dispositions	
2-8	Designation of Public Housing	20
2-9	Conversion of Public Housing	21
2-10	Homeownership	22
	2.10.1 Public Housing Homeownership	
	2.10.2 Section 8 Homeownership	
	2.10.3 Other Homeownership Programs	
2-11	Self-Sufficiency Programs and Improving Quality of Life and Economic Vitality.	22
	2.11.1 Resident Owned Business	
	2.11.2 Training and Contracting	
	2.11.3 Family Self-Sufficiency Program	
	2.11.4 Improve Quality of Life and Economic Vitality	
2-12	Safety and Crime Prevention in Public Housing Developments	24
	2.12.1 Public Housing Drug Elimination Program	
	2.12.2 "One Strike" Policy	
2-13	Certifications	24
2-14	Fiscal Audit	24
2-15	PHA Asset Management	24
2-16	Additional Information	25
	2.16.1 Criteria for determining substantial deviation from the 5-year plan	
	2.16.2 Resident Advisory Board Recommendations	
	2.16.3 Resident Membership on MDHA Board of Governors	

PART I. 5-YEAR PLAN UPDATE**1.1 MISSION STATEMENT**

We, the employees of Miami-Dade Housing Agency, through our collective efforts to positively enhance and better serve this community with integrity, care, high ethical standards, and competence, are committed to provide to low, very low, extremely low and moderate-income residents of Miami Dade County:

- Quality affordable housing opportunities.
- Neighborhood revitalization and stabilization activities.
- Partnerships with private and public entities to optimize resources through innovative programs.
- Efficient and effective management of resources.

1.2. GOALS AND OBJECTIVES

During the fiscal years 2005 through 2009, MDHA anticipates achieving the following goals and objectives within the scope of its mission:

Goal One: Expand and improve the range, supply and quality of affordable housing and affordable housing choices to the extremely low-, very low- and low-income residents of Miami-Dade County.

Objective 1: Complete the analysis on public housing developments conversion to tenant-based assistance and identify developments, which may voluntarily be converted, within the five year plan covering Fiscal Year 2005-2006

Objective 2: Complete construction and full occupancy of Ward Towers Assisted Living Facility (ALF) and promote full occupancy of Helen Sawyer ALF..

Objective 3: Continue construction under the Scott/Carver Homes HOPE VI Revitalization Program.

Objective 4: Assist families to move from renting to homeownership.

Objective 5: Expand outreach to private rental owners in order to attract new participation in the Section 8 program in cooperation with the Fair Housing Center, as required by the Adker Consent Decree.

Objective 6: Continue implementation of the Section 8 Homeownership program.

Objective 7: Continue implementation of the Section 8 Project-based Voucher Program.

Objective 8: Apply for additional rental vouchers that may become available.

- Objective 9:** Continue implementing the Capital Fund Action Plan, which includes the HOPE VI grant for Scott/Carver Homes and the Replacement Housing Factor funds for 40 public housing units.
- Objective 10:** Deliver timely and quality maintenance services to public housing residents.
- Objective 11:** Determine the effectiveness of the Preventive Maintenance program and implement improvements indicated by the study.
- Objective 12:** Achieve and maintain 95% or greater of rent collections for the public housing program.
- Objective 13:** Achieve and maintain 95% or greater occupancy levels in public housing units.
- Objective 14:** Continue the anti-fraud and audit programs to ensure agency's integrity and optimize use of resources.
- Objective 15:** Provide improved case management and referral services to residents.
- Objective 16:** Perform predevelopment activities for new assisted living facilities such as Smathers Plaza.

Goal Two: Improve Community Quality of Life and Economic Vitality

- Objective 1:** Maintain anti-crime activities and "One Strike" policies.
- Objective 2:** Implement measures to deconcentrate poverty and promote income mixing in public housing developments in concert with the Adker Consent Decree.
- Objective 3:** Planning to designate 3,848 elderly public housing units for occupancy only by the elderly families.
- Objective 4:** Seek increase funding necessary for "Aging-in-Place" initiatives and prevention of premature institutionalization of elderly, disabled residents by early intervention and coordination of social services.

Goal Three: Promote self-sufficiency and asset development of families

- Objective 1:** Seek new partnerships with both public and private entities to enhance social and economic services to residents of public and assisted housing.
- Objective 2:** Maintain the Family Self-Sufficiency program in the assisted housing program.

Objective 3: Continue with the disallowance of increase in annual income, in accordance with the regulation.

Objective 4: Monitor contractors/sub-contractors' Section 3 efforts in meeting training, employment and contracting goals for public and assisted housing residents.

Goal Four: Ensure Equal opportunity and affirmatively further fair housing

Objective 1: Use the tenant-based program and other available resources to expand housing opportunities beyond areas of traditional low-income and minority concentrations.

Objective 2: Encourage the participation of privately owned U.S. HUD-assisted housing in order to increase the choice of private rentals in cooperation with the Fair Housing Center, as required by the Adker Consent Decree.

Objective 3: Maintain the Adker Consent Decree approved by the U.S. District Court, Southern District of Florida on October 28, 1998.

Objective 4: Continue to implement an effective Affirmative Housing Marketing Plan when the waiting lists are opened to affirmatively further fair housing.

Objective 5: Continue to monitor Section 504, ADA, Fair Housing Act, and all other applicable accessibility requirements in public housing new constructions, existing public housing developments, and other MDHA assisted housing programs.

Objective 6: Implement Section 504, ADA, Fair Housing Act and applicable accessible requirements modifications to MDHA's existing housing units, MDHA's administrative offices and MDHA's non-housing programs and revised Admissions and Continued Occupancy Policy in accordance with the milestones and objectives established in the Voluntary Compliance Agreement (VCA) between MDHA and USHUD.

PART 2. ANNUAL PLAN: OCTOBER 1, 2004- SEPTEMBER 30, 2005

2.1 NEEDS ASSESSMENT

The affordable housing needs of the jurisdiction served by Miami-Dade Housing Agency are best described in the Housing Needs Section of the 2003 – 2007 Consolidated Plan. Analysis of data in the Consolidated Plan reveals that the largest segment of population most likely to need affordable housing is in the extremely-low income category (30% or less of area median income). This group has the highest incidence of overcrowding and cost burdens. Similar conditions exist as well for the very-low income category (31 –

50% of area median income). According to the 2000 Census, Miami-Dade County's population increased by 316,000 since 1990. One-third of the increase is considered natural while two-thirds is attributed to immigration. The population of Miami-Dade County is expected to grow by 150,000 within the next five years. It is anticipated that at least 3,227 affordable housing units will be required within the next five years to meet the needs of the extremely-low and very-low income groups of Miami-Dade County.

MDHA, as one of the primary affordable housing providers in the County, can be expected to meet a significant portion of the affordable housing needs of the County. MDHA's waiting lists were re-opened on March 2001, processing approximately 64,000 applicants. MDHA is requesting approval to re-open its waiting lists from every two years, to every 3-5 years, based on availability.

2.2 FINANCIAL RESOURCES

2.2.1 SOURCE AND USE OF FUNDS

MDHA's Financial Resources - Source and Use table is found in the Annual Plan.

2.3 SELECTION AND ADMISSION POLICIES

The selection and admission policies that cover the public housing program and the Section 8 programs administered by MDHA are contained in the Admissions and Continued Occupancy Policy (ACOP) and the Section 8 Administrative Plan, respectively. Both policy documents were revised to include provisions of the Adker Consent Decree approved by the U.S. District Court, Southern District of Florida on October 28, 1998 as well as federal regulatory changes. In accordance with the Decree, applicants on the project-based waiting list may state a preference for desegregative placements in specific Public Housing, Moderate Rehabilitation or participating privately owned HUD-assisted developments at which the applicant's race does not predominate.

The specific Selection and Admission Policies are as follows:

2.3.1 Public Housing (ACOP)

- Waiting List Policies
- Eligibility and Selection Criteria
- Unit Assignment Policies
- Occupancy Policies

2.3.2 Section 8 Administrative Plan

- Waiting List
- Eligibility and Selection of Applicants
- Special Purpose Program Selection
- Occupancy Policies

2.4 RENT DETERMINATION

2.4.1 Public Housing Program

Income-Based Rent

Public housing families have the opportunity to choose an income-based rent or a flat rent during their re-certification. The income-based rent is set at the highest of either 30% of adjusted monthly income, 10% of gross monthly income, the welfare rent or the minimum rent. The choice of rent type can be made at the annual re-certification or upon verification of financial hardship criteria at the interim review. The conditions of financial hardship include:

- a) A decrease in income because of changed circumstances such as a loss or reduction of employment, or a loss or reduction of other assistance, or the death of a family member; or
- b) An increase in expenses because of changed circumstances such as medical costs, childcare, and other allowable deduction expenses.

Once MDHA determines that a family is unable to pay the flat rent because of the financial hardship, MDHA shall switch the family's rental payment from flat rent to income-based rent.

Flat Rent

The Flat Rent is an amount of rent determined by MDHA based on the market value of comparable units in the private-unassisted rental market. In performing the comparability study of the public housing units, the Section 8 rent reasonableness study of comparable housing was used as well as a survey of similar unassisted units in the neighborhood. .

Each resident is given the opportunity to choose between the Income-Based Rent and the Flat Rent options at the time of admission and re-examination; and the resident's file is documented to indicate that offered was rendered. As expected, families accepting the Flat Rent offer are those that would pay more rent by choosing the Income-based Rent. Residents are required to sign a form indicating that they have been offered and explained both rent options.

Earned Income Disallowance

Public housing residents who meet one of the following criteria shall receive 100% earned income disallowance for the 12 months of employment beginning on the effective date of employment, and 50% earned income disallowance in the second months of employment. Thereafter, all earned income will be included in the annual income calculation. The criteria for receiving the earned income disallowance are:

- a) A public housing family whose income increases as a result of employment of a family member who was previously unemployed for

one or more years. "Previously unemployed" includes a person who has earned no more than the established minimum wage for 10 hours of work per week for 50 weeks within 12 months of the review; or

- b) A public housing family whose employment income increases during the participation of a family member in any family self-sufficiency or job training program; or
- c) The public housing family who is or was, within six months of the review, assisted under any state TANF program as determined by MDHA in consultation with the Florida Department of Children and Families.

Minimum Rent Policy

The minimum rent established for the public housing program administered by MDHA is \$25.00. A public housing family may request an exemption from payment of the minimum rent if the family is unable to pay because of financial hardship, as described in the situations below:

- a) When the family is awaiting an eligibility determination for, or has lost eligibility for, a federal, State or local assistance program due to a durational time limit on benefits while in compliance with work requirements;
- b) When the family would be evicted as a result of the imposition of the minimum rent requirement;
- c) When the income of the family has decreased because of changed circumstances, including loss of employment; or
- d) When the death of a family member occurs.

If the family requests a hardship exemption, MDHA shall suspend the minimum requirement until the qualifying financial hardship is determined and for the duration of the hardship. If the qualifying hardship is considered temporary (less than 90 days) MDHA will reinstate the minimum rent from the time of suspension and offer the family a reasonable repayment agreement for the amount of back rent owed. If the qualifying financial hardship is considered long term (more than 90 days), MDHA shall continue the exemption of the family from the minimum rent requirements until the regular annual re-examination when the family's income and composition is re-determined.

MDHA shall not reduce the annual income or the contribution toward rent of a public housing family because of a reduction in the family's welfare assistance specifically because of fraud, or failure to participate in an economic self-sufficiency program, or failure to comply with a work activity requirement.

Rent Re-determinations

When a public housing family experiences an income increase or decrease of \$40 or more per month, the family is required to report the change in family income. All changes in family composition are required to be reported as they occur. Families that select an Income-based Rent will have the family income and composition re-examination annually. Families that select a Flat Rent will have the annual re-examination of the family composition and the re-examination of the family income every

three years, unless a family has a verifiable financial hardship and is switched to the Income-based Rent determination method.

2.4.2 Section 8 Tenant-based Program

Minimum Rent

The minimum rent established for the Section 8 tenant-based program is \$25.00. Statutory requirements call for exceptions to the minimum rent based on a financial hardship. Situations of financial hardship include the following:

- 1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state or local assistance program;
- 2) The family would be evicted as a result of the imposition of the minimum rent;
- 3) The income of the family has decreased because of changed circumstances, including loss of employment; and
- 4) A death in the family has occurred.

If the family requests a financial hardship exemption, MDHA will suspend the minimum rent requirement until a determination is made as to whether the hardship is short-term (90 days or less) or long-term (more than 90 days). Families determined to have a short-term hardship will have the minimum rent reinstated and will be required to repay the rent due. Families determined to have a long-term hardship will continue to receive exemption from the minimum rent payment until the next annual reexamination.

Payment Standards

The payment standard utilized by MDHA will be between 110 and 110%, depending on the bedroom size, level of the Fair Market Rent (FMR) published by U.S. HUD for the Miami Metropolitan Statistical Area. Based on the MTCS data and the market surveys for private rental units in the MDHA jurisdiction, the payment standard set is considered high enough to allow most families to find decent and affordable housing.

2.5 OPERATION AND MANAGEMENT

2.5.1 Management Structure

Organization of the MDHA management structure is illustrated in the Optional Attachments fl005s01 and fl005t01 of the PHA Plan.

2.5.2 U.S. HUD Programs Under MDHA Management

Program Name	Units or Families Served at Year Beginning 10/01/04	Expected Turnover
Public Housing	10,340	1,200
County-owned Section 8 New Construction	536	10

Turnkey III Homeownership	47	2
Section 8 Vouchers	12,493	1,200
Section 8 Moderate Rehab.	2,908	500
Special Purpose Section 8 Vouchers Mainstream Program	75	7
Special Purpose Section 8 Vouchers Welfare to Work Program	625	60
Special Purpose Section 8 Vouchers Designated Housing	200	20
Family Unification Vouchers	442	40
Section 8 Portable Vouchers	363	0
Section 8 Single Room Occupancy	290	40
Section 8 Shelter Plus Care	586	100
Public Housing Drug Elimination Program (PHDEP)	PHDEP funds eliminated as of 2002. Partial funding merged with Public Housing Operating Funds	
Section 8 New Construction (Privately owned)	487	50
Section 8 Substantial Rehabilitation	809	80
Access 2000 Vouchers	10	1
Tornado Vouchers	59	5

NOTE: Section 8 Project-based Voucher Program

- ◆ As part of the Scott/Carver HOPE VI Revitalization Plan, MDHA proposes to construct 175 project-based voucher units to provide rent subsidy to families displaced by the demolition and reduction in density at Scott/Carver Homes.
- ◆ Accepted and approved applications attached to no more than 25% of the development's units for Section 8 project-based voucher program. MDHA entered into a 10-year Housing Assistance Payment (HAP) contract to provide project-based assistance to 50 units. Additional units will be placed under HAP contract as vouchers become available.

2.5.3 Management and Maintenance Policies

Management Policies

MDHA's rules, standards and policies regarding the management and maintenance of the public housing program are found in several policy documents which are:

The Admissions and Continued Occupancy Policy
The Conventional Public Housing Dwelling Lease
The Community Policies;

MDHA continuously strives for the highest performance standards that it can achieve under the annual Public Housing Assessment System (PHAS). Best results are achieved by management's strict enforcement of MDHA's Lease and Community Policies and constant monitoring of activities at each site.

MDHA is responsible for the management of 124 developments comprised of 10,577 dwelling units. The management organization consists of a Division Director supported by three Regional Managers who have 30 Site Managers reporting to them. Each site is made up of several developments each containing between 200 to 900 dwelling units. The number of units assigned to a site varies depending on size and type of buildings, demographics of the population, the geographic location, and proximity of developments to each other. The Site Manager is responsible for management of the site including all administrative functions, re-certifications, budget, maintenance, contract monitoring, and procurement of materials and supplies.

The Director of Public Housing and the Regional Managers ensure that the Site Managers and site staff are managing the properties according to established standards by reviewing key indicators on the Monthly Management Report. Whenever these key indicators deviate from the established standards, action is taken to determine the cause so that assistance can be provided to the site, if necessary.

The Assistant Director reports to the Director of Public Housing and is responsible for overseeing the management of services of the Helen Sawyer ALF. The Assistant Director also directs the Quality Assurance Team, who perform annual inspections of Public Housing units, life safety inspections in elderly high-rises; and oversee the Specialty Team, which perform routine maintenance work in Public Housing sites, including painting, landscaping, and lawn maintenance work and other agency-wide contracts. The Assistant Director directs the Vacancy Teams responsible for preparing vacant units for occupancy and the Public Housing Family Self-Sufficiency Programs.

Another significant monitoring tool available to the Director of Public Housing and the Regional Managers is the monthly Site Receipts and Expenditure Report. The report shows variances between each site's income and expenditures data and the approved budget, as well as roll-up summaries of the data to regional and divisional levels. Site Managers are required to explain/justify variances in their budgets but may also recommend revisions.

The public housing staff has had an additional position added to the staff to conduct quality assurance reviews. The responsibilities of the new staff member will be to review and monitor site compliance with MDHA procedures and PHAS regulations ensuring uniformity and consistency in their application, and provide training as necessary to improve the performance of MDHA site staff. He/she will accomplish these tasks by routine site visits to review administrative criteria specified by the Public Housing Director and compliance with federal regulatory requirements.

Private Management of Public Housing Units

A pilot program by MDHA to observe the success of private management of its public housing sites was implemented. The program was established to test the premise that private property management companies were more efficient than the public sector. The common sentiment was that changes in the areas of procurement, contracts, personnel, job functions and classifications, typical of private management efficiency could generate additional management savings. Currently, one site consisting of 297 units remains privatized..

The initial privatization of the sites has produced a positive effect on MDHA Public Housing Division over the contract period. The grounds of sites managed by public housing managers improved dramatically because of the visual impact of private managed sites. Public housing staff productivity also improved visibly due to the ability to compare the private managed sites to the public manages sites. Contract services supplied to the private managed sites were measurably cheaper than similar services to the public managed sites. This initiated a review of the public sector contracts. The speed and agility by which private managers handle personnel matters proved of significant advantage in responding to personnel changes and addressing substandard performance by employees. The private managed sites also had a marked advantage when procuring materials needed for site maintenance.

A study of the private management pilot program was conducted by FIU. They recommended that the private management company's contracts allow for further evaluation and comparison of management performance. As a result, the private management companies' contracts have been extended to allow for further evaluation and comparison of management performance and services to the residents of MDHA public housing. The changes made by MDHA in its own management also proved beneficial in terms of better performance, reduced costs, more efficiencies, and improvement in the quality of service to MDHA public housing residents. As of January 2005, two (2) of the original four (4) private management companies have been terminated or terminated their contract with MDHA. These units have been turnover to public housing managers as a potential site for the EDGE program.

Employee Demonstration of Growth and Efficiency (EDGE)

In addition to the private management program, the Employee Demonstration of Growth and Efficiency (EDGE) program was introduced during fiscal year 2000-2001. EDGE is a cooperative effort between MDHA management and MDHA's employee bargaining units. The program goal is to increase efficiencies in resource use, thereby increasing productivity, and providing public housing residents with superior service. Both parties have signed a Memorandum of Understanding (MOU), which allows modifications to the labor maintenance structure, and procedural and managerial operation. Organizational changes made by MDHA resulted in site managers being made responsible for site maintenance and material procurement, thus eliminating a system of centralized maintenance and inventory control functions. A site based budget and costing system was developed allowing for better assignment of responsibility, accountability, and monitoring of site performance. The program continues for the first three years of the plan and then the results will be compared with the performance of the private management companies.

An independent consultant will evaluate the performance of these programs and the program producing the best results will be used during the final two years of the plan.

Efficiency Programs

MDHA has initiated an in house Specialty Team to address special maintenance needs of the sites while reducing the cost for the services. The Specialty Team uses in house personnel to perform activities that otherwise would be contracted to a vendor. The specialty team conducts a multitude of services for the agency including trimming trees, removal of bulk trash, performing cleaning and painting of the interior and exterior of the units, performs lawn services and conducts a multitude of small miscellaneous maintenance services. The Specialty Team gives the agency great flexibility in the type of service that can be provided to the sites and gives the ability to respond immediately to emergencies that might otherwise be costly or be delayed due to contractual restrictions. The team also maintains an appliance refurbishment program. It is responsible for cleaning, testing, repairing, and painting appliance for re-issue and use in the units. MDHA has regained management of operations for two of the sites formally under private management.

Private Rental Improvements in Management and Efficiency (PRIME)

MDHA selected Florida International University (FIU) to conduct an assessment and make recommendations for the improvement of the effectiveness and efficiency of all Section 8 programs, Private Rental Improvements in Management and Efficiency (PRIME). The FIU study included complete programmatic assessment, analysis and process mapping and measurement; development of adequate business and best practices standards of performance; redesign of Section 8 program functions to more effectively and efficiently provide services; expansion and modernization of the customer service function to include training for all Private Rental Housing employees; and development of long-term techniques to ensure that future program needs are addressed.

Phase I of the redesign process has been implemented, including an operational team based structure for improved employee performance and greater accountability. Since implementation, the scores in USHUD's Multifamily Tenant Characteristics System have had a dramatic improvement, increasing to over 100% percent. In addition, FIU completed a review of operations and reported on observations and made preliminary recommendations as a result of the review. In addition, team performance measures are scheduled to be introduced during 2005. As PRIME is fully implemented, MDHA and FIU will evaluate the improvements in productivity efficiencies, accountability to management and customer service to the community.

Maintenance Policies

The interior condition of MDHA's public housing units and the aesthetics of the sites' exterior are indicators of site staff performance levels. High standards are maintained through the development of a highly trained and dedicated site management and maintenance staff performing regularly scheduled inspections, maintenance repairs, and

preventative maintenance. Housing quality is assured by third party inspections completed by the Quality Assurance Section (HAS) staff applying Housing Quality Standards (HQS) and Uniform Physical Standards (UPS).

The delivery of routine as well as emergency maintenance to MDHA public housing residents is accomplished through a decentralized system of maintenance staffing, and procurement of maintenance materials. Each site has a staff of maintenance and custodial personnel that performs repairs and cleaning daily. Site management staff uses a computerized work order system to document and track work orders ensuring that maintenance problems are corrected properly and in a timely manner. Residents, the site manager, or staff members who inspect or tour their sites may initiate Work orders. A system of automatic work orders is now in place, as a follow-up to the annual unit inspections conducted by QAS staff.

Site maintenance staff is responsible for addressing emergency work orders immediately and the condition that caused the emergency must be abated immediately using any and all available resources. Under no circumstance is the condition that caused the emergency permitted to exist for over 24 hours. Once the emergency is abated, a work order is initiated to correct the condition. Routine work orders initiated by the resident are addressed on a daily basis. In situations where necessary materials and/or staff are not readily available, the work order is reported on the Outstanding Work Orders report. This report is used by the management staff to track work orders thus assuring that no work order becomes lost or misplaced.

The Site Manager can access several resources whenever necessary:

- a. The technical expertise of the Facilities Planning Section is available for consultation by the site manager about extensive repairs/construction.
- b. Site staff procures maintenance materials, supplies and other services through "blanket contracts" that have been negotiated and awarded by the Miami-Dade County General Services Administration.

MDHA has established the Preventative Maintenance (PM) Program. The PM program was designed so that maintenance could be performed on a predetermined schedule rather than be dictated by emergencies, breakdowns, or unhealthy and unsightly conditions. The PM program addresses high-rise system inspections and maintenance. Under the PM program, the computer generates work orders for the inspection of exterior building conditions, and common use areas such as parking lots, playgrounds, and sidewalks. Site maintenance staff completes the inspections and the necessary repairs are completed through work orders generated by the inspection.

Annual unit inspections are also included in the PM program. The unit interiors are inspected for smoke detectors, fire extinguishers, appliances, light fixtures, air conditioning units, windows and doors, call buttons, and stairways while their exteriors are inspected for site lighting, porch lighting, hose bibs, water shut off valve, and sidewalks. Approximately 30 days after the site inspection, MDHA's QAS conducts an inspection of the unit using U.S. HUD's Uniform Physical Standards for the inspection. Noted violations are forwarded to site staff for work orders to be issued and completed.

The Site Manager uses the documentation during resident re-certifications to remind residents of their responsibilities regarding the upkeep of the dwelling unit. Additional random sample inspections are conducted to ensure that violations noted in the Uniform Physical Standards Inspection are repaired appropriately.

Residents who do not keep acceptable housekeeping standards are required to attend housekeeping training. MDHA plans to work with the Overall Tenant Advisory Council (OTAC) to develop appropriate training programs, schedule classes, and conduct training for residents who fail to meet MDHA housekeeping standards.

Third party inspections are performed by MDHA's Quality Assurance Section (QAS) to improve and to assure uniform quality standards throughout the agency. QAS also has the responsibility of inspecting the completed "make ready units" prior to resident occupancy. All problems noted during the inspection must be corrected prior to the resident being permitted to lease the unit. This third party inspection has proven to be a tremendous benefit. The condition of the leased units has improved and the inspection records have proven to be excellent documentation in times of disputes concerning resident repair charges.

2.5.4. PHA Grievance Procedures

The resident grievance and appeal procedures of which public housing residents may avail themselves is found in the Community Policies document. The policy grants the resident the right to request a grievance hearing for actions taken by MDHA that adversely affect his/her rights, duties, welfare or status. Exclusion of a grievance hearing is in accordance with guidelines as set forth in 24 CFR **Part** 966 and the President's "One Strike" policy and is contained in the Community Policies. The grievance panel consists of the Chairman, appointed by the Director of MDHA, and two residents that include a member assigned by OTAC and a member assigned by the site's resident council.

Policies and Procedures Updates

MDHA is continually reviewing and updating its policies and procedures manual to assure existing procedures meet the needs of the staff and to comply with the new regulations and mandates from USHUD.

Ongoing verification from Tenant Assessment Subsystem (TASS) to verify discrepancies between income reported by the Social Security/ Supplemental Security Income Offices and the information reported to USHUD on the Family Income Report. The procedure requires the site staff to report progress reconciling the discrepancies monthly as well as report the progress to USHUD's on the Tenant Assessment Subsystem (TASS) reporting system.

USHUD also required an inventory of public housing rental units. The housing inventory was entered to the Public and Indian Housing Information Center (PIC) system. All public housing developments, buildings, and units were entered to the PIC system along

with their address and number of bedrooms and baths. This housing inventory data will be needed when the new 50058 format is mandated.

MDHA's pet policy has been revised to incorporate provisions related to assistive animals and pet security deposit. According to new regulations, the Pet Policy continues to apply to family and elderly residents, but it does not apply to animals that are used to support, or provide a service to persons with disabilities and are necessary as a reasonable accommodation. Assistive animal owners are subject to certain requirements and must certify that the assistive animal actually assists the person with a disability.

A policy has been developed that addresses USHUD's Community Service Requirement (CSR). The policy establishes the criteria for exempted residents, and the acceptable activities meeting the requirement.

The Deconcentration Policy, as included in the ACOP has been revised to incorporate the new provision under the final rule on the *Deconcentration of Poverty and Promoting Mixed Income*. MDHA has performed the required concentration of income analysis to the covered public housing developments, and determined the developments falling outside the Established Income Range.

MDHA is in the process of revising the Earned Income Disallowance policy to include an EID Worksheet and the automated tracking system

The Transfer Policy has been amended to incorporate additional provisions for transferring residents and waiting list applicants with disabilities into Uniform Federal Accessibility Standards-accessible units, and transferring and requiring occupants without a disability to relocate to a vacant, non accessible unit.

MDHA has established preference to qualified elderly current residents who request transfers to Assisted Living Facilities (ALF), then to eligible applicants on the waiting list and thereafter to non-AFL eligible residents and applicants.

MDHA has established specific standards for applicant denial of admission and resident termination of assistance in accordance with federal regulations and the One Strike rule.

2.5.5. Fraud Investigation and Audit

MDHA's Office of Compliance is committed to eliminating fraudulent activity and program abuses or violations, through the establishment of the Fraud Control Program. This program will enable MDHA to identify and prevent program abusers, sanction those who take advantage of the system, recover funds and prosecute offenders when appropriate. The MDHA Fraud Hotline has been established to receive calls regarding allegations of suspected fraud, criminal activity or wrongdoing by MDHA residents, staff, or entities doing business with the agency.

The audit functions' objectives are to ensure compliance with USHUD and MDHA regulations and procedures. Audit functions include performing internal audits or reviews for evaluating compliance with Federal, State, and County regulations,

responding to external audits findings, developing corrective actions and rendering recommendations. Additional functions under the audit program include annual revision of public housing utility allowances, monthly monitoring of discrepancies in residents' reported earned and unearned income, and monthly reviews of reimbursement requests by the Fair Housing Center for class members under the Ann Marie Adker Consent Decree. The audit functions were expanded in 2003 by hiring an additional employee.

2.6 CAPITAL IMPROVEMENTS

2.6.1 Capital Fund Five Year Plan

The FY 2005 Capital Budget and Multi-year Capital Plan will be provided to MDHA, in the estimated amount of \$14 million for 2005-06 in the fall of 2005 of which \$ 8.5 - million will be programmed for direct capital expenditures. These expenditures are for renovations, repair and comprehensive modernization in public housing developments, as well as compliance with the Uniform Federal Accessibility Standards (UFAS) requirement under the Voluntary Compliance Agreement (VCA), and the acquisition and installation of equipment, including stoves, refrigerators and elevator upgrades in high rise buildings.

Included in the plans is the installation of air-conditioning in elderly and family developments, and interior and exterior renovations, including roof replacements at Model Cities, Lincoln Gardens, and other developments.

Unfunded Needs/Priorities

MDHA capital needs for one of the nation's largest public housing stocks are estimated at \$100 million over the five-year period ending in FY 2009-10. Assuming federal capital fund allocations over the next five years average \$14 million per year for a total of \$70 million, a net unfunded need of approximately \$30 million would remain. Funding for capital improvements is subject to change on an annual basis depending on operational requirements and federal funding allocations.

Projects Completed/To Be Completed

- ◆ MDHA is now working on the implementation of the CFP 50104.
- ◆ MDHA was awarded \$12.2 million in CFP 50103 funds in FY 2003. Modernization projects funded from this grant extend throughout MDHA's public housing stock and include interior and exterior improvements such as: Edison Courts - roof replacement, In-Cities comprehensive modernization, and Modello - air conditioning installation. These funds are approximately 54% obligated.
- ◆ CFP 50102 (FY2002) in the amount of \$15.4 million is 100% obligated, and include the following major projects: Jolivette - window—replacements, Newberg -- new drainage system, and Annie Coleman-air conditioning installation. These funds are 100% obligated.

Section 504 Needs Assessments for Public Housing

MDHA will modify its administrative offices, common areas and other facilities, and conduct a Needs Assessment study of public housing units required to meet needs of residents and waiting list applicants with disabilities, as well as compiling demographics of residents and income-eligible persons with disabilities in the area

2.6.2 Capital Fund Annual Statement

The FY 2004 annual statement allocates \$8.5 million for miscellaneous repairs for the following PHA-wide work items: General interior repairs including kitchen cabinets, extensive plumbing, electrical and air conditioning work, as well as, exterior painting, roof repairs, storm shutters, termite extermination, dwelling equipment, residents' relocation and security and fire protection systems. Also included in this Plan are limited and comprehensive modernization of Coleman Gardens, Newberg, Venetian Gardens, Palm Courts and the installation of central air conditioning at Rainbow Village, Culmer Place and Gwen Cherry.

The Capital Fund Annual Statement also includes funding for the design of a prototype wellness center as part of the agency's Aging in Place plan, in different locations.

2.6.3 HOPE VI**Scott/Carver Homes**

MDHA has been awarded a HOPE VI grant of \$35 million for the revitalization of Scott Homes and Carver Homes. The HOPE VI Revitalization Plan was approved by USHUD on August 30, 2001. (See Supporting Document 2.6.3).

The proposed HOPE VI Revitalization Plan addresses the de-concentration of poverty requirements. It calls for the demolition of all 754 existing dwelling units of Scott Homes and all 96 dwelling units of Carver Homes, a total of 850 units.

Over the next four years, 411 new townhouse and single-family dwelling units will be built to replace the demolished units on the site. This calculates to a reduction in density of 52%.

For HOPE VI projects update refer to the Statement of Progress attachment.

Promoting Integration in Public Housing:

The proposed HOPE VI Revitalization Plan also addresses the requirements for promoting integration of income levels in public housing. Of the 371 new units, 156 will be dedicated to affordable homeownership by low-income families utilizing deeply discounted, low (or no) interest rate, second mortgages and other financing incentives with the objective to allow any low-income family with a steady income and acceptable credit to qualify for purchase of their new home. The HOPE VI Revitalization Plan was developed with the consultation of the residents of the two developments.

Ward Towers Assisted Living Facility

The new construction of a five-story, 100-unit apartment building has been funded by a \$4.7 million HOPE VI grant. The new building will house the Ward Towers Assisted Living Facility (ALF), which will connect to the existing elderly development, for which it is named, by a one-story service center. Services that the center will provide include healthcare, meals, and transportation, etc.

The Ward Towers ALF is modeled after the Helen Sawyer ALF which is known to be the first ALF of its kind in the nation to serve the needs of low-income frail elderly residents by obtaining state Medicaid Waivers and Optional State Supplements. The optional State Supplement is considered income for determining eligibility but the Medicaid Waiver can only be used to provide case managers, social services such as, nursing/certified nursing assistance activities.

A 3.50 acre parcel of land, partitioned from the existing surplus land of Ward Towers, will be leased by Miami-Dade County to the limited partnership which has been created to issue and sell the Low-Income Housing Tax Credits.

2.7 DEMOLITION AND/OR DISPOSITION**2.7.1 Demolitions****Demolition and Revitalization of Scott Homes HOPE VI**

Under the \$35 million HOPE VI grant awarded to MDHA in 1999, all buildings in the four sectors of the Scott/Carver development have been approved to be demolished and replaced with single-family homes and townhouse housing. The planned reduction of on-site density will be 52% from 850 to 411 on-site dwelling units. Over half of the current residents of Scott/Carver will be able to use Housing Choice Vouchers during relocation activities while the other families either plan to purchase their own homes, or are working families enrolled in the family self-sufficiency program to live in public housing units.

As part of the Scott/Carver HOPE VI Revitalization Plan, MDHA proposes to construct 175 project-based voucher units to provide rent subsidy to families displaced by the demolition and reduction in density at Scott/Carver Homes. The need for affordable housing units is demonstrated in MDHA's Annual Plan as well as Miami-Dade County's Consolidated Plan.

2.7.2 Dispositions

Dwelling units approved or pending approval for disposition includes the following

DEVELOPMENT	TOTAL UNITS	ELDERLY	FAMILY
Carver Scattered Sites	8		8
Opa-Locka Family	17		17
Elizabeth Virrick I & II	84		84
Smathers Plaza	(Land Only)		
Townhouse Villas Homeownership	128		128
Vista Verde	21		21
Ward Towers	(Land Only)		
Scott Homes/Carver Homes – HOPE VI	(Land Only)		

2.8 DESIGNATION OF PUBLIC HOUSING

MDHA plans to apply to designate 3,848 elderly public housing units for occupancy only by elderly families. The developments proposed to be designated as elderly are:

Abe Arronovitz (55), Biscayne Plaza (52), Claude Pepper Towers (166), Dante Fascell (151), Edison Plaza (80), Falk Turnkey (48), Florida City Gardens (50), Gibson Plaza (65), Goulds Plaza (50), Haley Sofge (475), Harry Cain Towers (154), Jack Orr (200), Joe Moretti (288), Jollivette (66), Jose Marti Plaza (55), Lemon City (100), Little Havana I (75), Opa Locka Elderly (50), Palm Court (88), Palm Towers (103), Palmetto Gardens (40), Parkside I/II (56), Perrine Gardens (22), Peters Plaza (102), Phyllis Wheatly (40), Riverside (75), Robert King High (315); Smathers Plaza (182), South Miami Plaza (97), Stirrup Plaza (100), Twin Lakes (76), Ward Towers (200), Ward Towers ALF (100), and Wynwood Elderly (72).

MDHA will continue to conduct an analysis/study in accordance with the regulations prior to determination of elderly designation. MDHA has performed a survey during 2004 of elderly developments, to ascertain the resident's interest in obtaining elderly designation for these units, and other elderly units as well. The request for designation is planned to take effect during FY 2004-2005. Prior to submission to USHUD for special designation, projects must meet applicable USHUD requirements.

According to MDHA's Admissions and Continued Occupancy Policy (ACOP), units for the elderly can be occupied by elderly or disabled residents over age 18. With the approval to designate the development for elderly residents only, units as they become vacant should be offered only to elderly families.

MDHA received approval of its Designated Housing Plan on August 6, 1999, effective December 1, 2004. The Plan originally designated the 391-unit Three Round Towers development for occupancy by elderly only. The Designated Housing Plan was amended to include the 101-unit Helen Sawyer Plaza ALF on May 25, 2000. On December 2004, MDHA requested an extension for its Designated Housing Plan, for

Three Round Towers and Helen Sawyer ALF, which was approved for two (2) years effective February 3, 2005.

STUDY

The motivating factor which prompted the public housing industry to examine the issue of designation of public housing developments was as follows:

Many high-rise developments were built with a majority of the dwelling units being zero or one-bedroom sizes (a few with two-bedrooms) in order to accommodate the housing needs of elderly families. However, with the passage of time, persons with disabilities were housed among the elderly creating "mixed" population developments. Families with disabilities tended to be non-elderly families whose life-styles often were inconsistent with those of the elderly. The movement by elderly families towards demanding housing conditions more consistent with their lifestyles thus gained momentum. The situation became even more prominent with the passage of regulations, which abolished preferences for the elderly and disabled families in the "mixed" population developments.

National and local demographic data indicates that the housing needs of the elderly will become chronic within the next 10-15 years. Faced with this scenario, MDHA feels that this issue should be addressed in its first five-year PHA plan and will proceed to submit its designation applications for elderly only developments during the remaining two years of the PHA plan.

2.9 CONVERSION OF PUBLIC HOUSING

In 2004 MDHA completed a review of each covered development's operations as public housing, and considering the implications of converting the public housing to tenant-based assistance.

The initial review indicated that the Voluntary Conversion of public housing to tenant-based assistance is inappropriate because:

1. Conversion would be more expensive than continuing to operate the developments as public housing;
2. Removal of developments would not principally benefit resident of public housing developments; and
3. It would adversely affect the availability of affordable housing in the community.

MDHA is currently reviewing the market rental comparability study impacting the covered developments, in an effort to verify by analysis the economic feasibility of a conversion. Based on the results of this review, a final submission will be done for those developments to be converted, if any.

2.10 HOMEOWNERSHIP

2.10.1 Public Housing

During the last two years, 24 residents became homeowners. Two (2) units from the Turnkey III program closed and the resident became owners of the property. Additionally, 14 residents from public housing, and eight (8) from Section 8, had purchased homes through MDHA's Family Self Sufficiency (FSS) program.

The Turnkey III Homeownership program was established by MDHA in 1977-78. Of the approximately 150 units that were in the program, 46 remain to be sold to their program participants. The four homeownership developments include: Development FL 5-052A (2 units), FL 5-052B (1 unit), FL 5-052C (15 units), and FL 5-064 Heritage I (30 units). The majority of units are single family homes with a few condominium townhouses. The units are concentrated in northern Miami-Dade County while a few scattered throughout southern Miami-Dade County. Sixteen residents currently have accumulated sufficient funds in escrow to purchase their homes. It is anticipated that the remaining units will be sold to program participants by the end of the five-year PHA plan.

Section 32 Homeownership

As the Turnkey III Homeownership program is being phased out, MDHA anticipates expanding its homeownership program as allowed under Section 32 of the U.S. Housing Act of 1937. While the appropriate rule is being promulgated by USHUD, MDHA plans to survey its housing stock in order to identify possible units that may be converted to the homeownership program.

2.10.2 Section 8 Homeownership

MDHA has implemented a Section 8 Homeownership Program to provide Section 8 participants the opportunity to purchase a home. The Section 8 Homeownership Program is a joint effort of the Private Rental Housing Division, the Development and Loan Administration Division, and Resident Services, which will refer the eligible Section 8 families to participate in the Section 8 Homeownership Program. As of September 30, 2004, 330 families are completing the required homeownership counseling, 125 families have completed the counseling and are considered "mortgage ready." Seventeen (17) families closed on their home purchases during 2004.

2.10.3 Other Homeownership Programs

MDHA offers a variety of homeownership programs to low and moderate income families through its Development and Loan Administration Division and New Markets Division, such as Surtax, State Housing Initiative (SHIP), HOME, and Infill programs.

2.11 SELF-SUFFICIENCY PROGRAMS AND IMPROVING QUALITY OF LIFE AND ECONOMIC VITALITY

2.11.1 Resident-Owned Businesses

Home-Based Businesses:

MDHA has implemented public housing home-based business policy and procedures with the new public housing lease effective October 2003.

2.11.2 Training and Contracting

- ◆ MDHA facilitated its third interagency contractors' workshop with Miami-Dade Office of Community and Economic Development (OCED) in 2004 and promoted MDHA's Section 3 program on-line and a brochure in English, Spanish and Creole.
- ◆ MDHA has continued to assist OCED, and the Cities of Miami and Hialeah on Section 3 technical and implementation issues. MDHA has continued to promote advantages of becoming a certified Section 3 business to current and prospective contractors and vendors at agency meetings and community forums.
- ◆ MDHA plans to implement a training and employment procedures for public housing residents, Section 8 recipients and other low-income Miami-Dade residents.
- ◆ MDHA plans to continue offering Section 3 business applications on-line, promoting its Section 3 training, employment and contracting opportunities, increasing the number of Section 3 employed persons, and providing annual interagency Section 3 workshops with the Office of Community and Economic Development.

2.11.3 Family Self- Sufficiency Program

MDHA's actual Family Self-Sufficiency Program size is of 535 participants, 249 public housing residents and 286 Section 8 residents.

2.11.4 Improve Quality of Life and Economic Vitality

- ◆ MDHA will implement measures to deconcentrate poverty and promote income mixing in concert with the Adker Consent Decree.
- ◆ MDHA will continue to provide supportive services at Helen Sawyer ALF by being the designated case management agency to provide extensive case management services, and continue to promote its full occupancy.
- ◆ MDHA will implement the design of a prototype "wellness center" as a component of its Aging in Place plan.
- ◆ MDHA will continue to search for various grants and funding opportunities, via public and private resources.
- ◆ MDHA will continue to provide community building/technical assistance to resident groups by providing the following services: empower resident associations to be advocates for issues effecting their communities, help resident groups with

coordination of recreational activities and special events and assist residents in forming or strengthening resident organizations.

2.12 SAFETY AND CRIME PREVENTION IN PUBLIC HOUSING

2.12.1 Public Housing Drug Elimination Program (PHDEP)

- ◆ MDHA will improve quality of life and maintain a drug related crime free environment by increasing the number and quality of training of crime watch participants at elderly sites, continue to coordinate with Citizens on Patrol (COP) and Team Police assigned to elderly sites.
- ◆ Based on statistical reports from the various police departments, public housing developments experienced a decrease in drug related crimes by approximately fifty percent (50%). Additionally, local residents became more actively involved in community and economic self-sufficiency activities.
- ◆ Apply the use of closed circuit television cameras (CCTV) to enhance security at one elderly development and continue with lighting and access control as a means of crime prevention.

2.12.2 “One Strike” Policies

MDHA will continue to implement “One Strike” policies as part of the public housing security improvements.

2.13 CERTIFICATIONS

MDHA will comply with all federal regulations. MDHA certifications of compliance are shown in the **supporting documents 2.13**.

2.14 FISCAL AUDIT

MDHA is required to have a fiscal audit conducted under Section 5(h) (2) of the U.S. Housing Act of 1937. MDHA's 2003 Fiscal Year audit is being prepared for submission to U.S. HUD (**see support document 2.14**).

2.15 PHA ASSET MANAGEMENT

MDHA administers two HOPE VI grants that encompass making a long-term capital investment, operating public housing with private management, disposing of ACC units in Scott Homes and Carver Homes, developing new homeownership, rent-to-own public housing units and new ALF units over a five-year period in Liberty City. Details are provided in the HOPE VI applications.

2.16 ADDITIONAL INFORMATION

2.16.1 Criteria for Determining “Substantial Deviation” or “Significant Amendment or Modification” to the Five-Year Plan

MDHA shall define “a substantial deviation” from its five-year plan as any discretionary change in its mission, goals and objectives, which would require formal approval by the BCC. A “significant amendment or modification” to its five-year plan is any discretionary change in the non-regulated activities described in the annual plan impacting all program participants and requiring formal approval by the BCC. Included in such “significant amendment or modification” to the plan may be the following:

- ◆ Changes to rent, admissions policies, or organization of the waiting list;
- ◆ Additions of non-emergency work items not included in the Annual Plan or the Five-Year Plan that exceed \$500,000, or a change in the use of replacement reserve funds under the Capital Fund; and
- ◆ Any change with regard to demolition, disposition, and designation of public housing developments, homeownership programs, or conversion activities.

2.16.2 Resident Advisory Board Recommendations

The Resident Advisory Board(s) comments and recommendations are attachments to the PHA Plan ..

2.16.3 Resident Membership on the BCC

MDHA requested legal counsel regarding the representation by a duly elected resident of Public Housing to the BCC. The opinion rendered by Miami-Dade County’s legal counsel indicates that MDHA may be exempt from the requirement, as outlined in 24 CFR 964.425(b) of the proposed rule or 24 CFR 964.405(b)(2) of the final rule. The Governing Board Statement of Exemption is an attachment to the PHA Plan.